

Robert P. Simons
Email: rsimons@reedsmith.com
REED SMITH LLP
225 Fifth Avenue, Suite 1200
Pittsburgh, PA 15222
Telephone: 412-288-3131
Facsimile: 412-288-3063

Attorneys for Bank of New York Mellon,
solely in its capacity as Trustee under
Enumerated Trust Indenture Trusts

FILED
MAR 26 2019
UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

Debtor-in-Possession.

Bankr. Case No. 19-30088-DM

Chapter 11

In re:

PACIFIC GAS AND ELECTRIC COMPANY,

Debtor-in-Possession..

Bankr. Case No. 19-30089-DM

Chapter 11

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE AND SERVICE
OF PAPERS**

PLEASE TAKE NOTICE that Bank of New York Mellon ("BNYM") solely in its capacity as Trustee under certain Enumerated Trust Indenture Trusts¹, a creditor and a party in

¹ The trusts the Bank of New York Mellon serves as trustee for currently include the following: Pacific Gas and Electric Company Nuclear Facilities Nonqualified CPUC Decommissioning Master Trust for Diablo Canyon Nuclear Generating Station and Humboldt Bay Nuclear Unit No. 3; Pacific Gas and Electric Company Nuclear Facilities Qualified FERC Decommissioning Master Trust for Diablo Canyon Nuclear Generating Station and Humboldt Bay Nuclear Unit No. 3; Pacific Gas and Electric Company Nuclear Facilities Qualified CPUC Decommissioning Master Trust for Diablo Canyon Nuclear Generating Station and Humboldt Bay Nuclear Unit No. 3; PG&E Postretirement Medical Plan Trust – Non-Management Retirees; Pacific Gas and Electric Long-Term Disability Trust for Non-Union Employees; Postretirement Life Insurance Plan Trust; PG&E Corporation Retirement Master Trust; Pacific Gas and Electric Long-Term Disability Trust for Union Employees; and PG&E Postretirement Medical Plan Trust – Management and Non-Bargaining Unit Retirees (collectively, the "Enumerated Trust Indenture Trusts").

1 interest by and through its counsel, Reed Smith LLP hereby enter its appearance pursuant to Rule
2 9010(b) of the Federal Rules of Bankruptcy Procedure.

3 **PLEASE TAKE FURTHER NOTICE** that counsel for BNYM hereby requests
4 pursuant to Rules 2002, 3017(a), 9007, and Section 1109(b) of the Bankruptcy Code, that copies of
5 all notices and pleadings given or required to be given in these cases, and copies of all papers served
6 in these cases, shall be given to and served upon Reed Smith at the following address:

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8 Robert P. Simons
9 REED SMITH LLP
10 225 Fifth Avenue, Suite 1200
11 Pittsburgh, PA 15222
12 Telephone: 412-288-3131
13 Facsimile: 412-288-3063
14 Email: rsimons@reedsmith.com

15 **PLEASE TAKE FURTHER NOTICE** that the foregoing request includes
16 without limitation, all orders, applications, pleadings, motions, petitions, requests, schedules,
17 statements, complaints or demands, whether formal or informal, arising herein or in any way related
18 to these cases, including any adversary proceedings.

19 **PLEASE TAKE FURTHER NOTICE** that BNYM does not, by filing this *Notice*
20 *of Appearance and Request for Notice and Service of Papers*, nor any subsequent appearance,
21 pleading, claim or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this *Notice*
22 *of Appearance and Request for Notice and Service of Papers* constitute a waiver of any of its rights:
23 (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii)
24 to trial by jury in any proceeding so triable in these cases, or any controversy or proceeding related
25 to these cases; (iii) to have the District Court withdraw the reference in any matter subject to
26 mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or
27 recoupments to which it may be entitled, which it expressly reserves.
28

1 DATED: March 25, 2019

2 REED SMITH LLP

3 By: 

4 Robert P. Simons

5 Email: rsimons@reedsmith.com

6 Reed Smith LLP

7 *Attorneys for Bank of New York Mellon,*
8 *solely in its capacity as Trustee under*
9 *Enumerated Trust Indenture Trusts*